

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

E. Richard Dressel, Esquire (ED1793)
Lex Nova Law, LLC
10 E. Stow Road, Suite 250
Marlton, NJ 08053
rdressel@lexnovallaw.com
(856) 382-8211
Attorneys for Andrew Sklar, Chapter 7 Trustee

In Re:

ORBIT ENERGY & POWER, LLC,

Debtor.

ANDREW SKLAR, CHAPTER 7 TRUSTEE,

Plaintiff,

CADILUS, INC.,

Defendant.

Case No.: 22-19628 (ABA)

Adv. Pro No.: 23-1338 (ABA)

Chapter: 7

Date of Hearing: 07/16/24 @ 10:00 a.m.

Judge: Andrew B. Altenburg

**NOTICE OF MOTION TO APPROVE SETTLEMENT AGREEMENT BETWEEN
ANDREW SKLAR, CHAPTER 7 TRUSTEE OF ORBIT ENERGY & POWER, LLC
AND ELEMENT 78 PARTNERS LLC/CADILUS, INC.**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on July 16, 2024 at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Andrew Sklar, as Chapter 7 trustee (the “Trustee”) for Orbit Energy & Power, LLC (“Debtor”), shall move before the Honorable Andrew B. Altenburg, Jr., United States Bankruptcy Judge, at the United States Bankruptcy

Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, NJ. 08101, Courtroom 4B, for entry of an order (the “Order”) approving the settlement agreement (“Settlement Agreement”) by and between the Trustee and Element 78 Partners, LLC/Cadilus, Inc., which is attached as Exhibit A to the Certification of Andrew Sklar in Support of the Motion (the “Sklar Certification”), and for related relief (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Sklar Certification and Memorandum of Law, which set forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed with the Court and served upon the undersigned no later than seven (7) days prior to the hearing date hereupon. Unless objections are timely filed and served, the relief requested in the Motion may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion if objections are timely filed.

Date: June 14, 2024

Respectfully submitted,

LEX NOVA LAW, LLC

By: /s/ E. Richard Dressel
E. Richard Dressel, Esquire
Attorneys for Andrew Sklar,
Chapter 7 Trustee, Plaintiff